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Government Coordinating Counsel

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE CHRYSLER-DODGE-JEEP
ECODIESEL MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

This Document Relates To:

ALL ACTIONS

Case No. 3:17-md-02777-EMC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO FILE
JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

The Honorable Edward M. Chen

WHEREAS, the Court set an August 8, 2017 case management conference in Pretrial Order Number 3 (“PTO 3”) (Dkt. 173);

WHEREAS, PTO 3 requires the Plaintiffs' Steering Committee (the "PSC"), Government Coordinating Counsel, and counsel for the Defendants (collectively, the "Parties") to file a joint

1 case management conference statement one week prior to the August 8, 2017 case management
2 conference;

3 WHEREAS, the PSC and Government Coordinating Counsel have met and conferred with
4 counsel for the Defendants regarding the joint case management conference statement;

5 WHEREAS, due to the complexities of this litigation, the Parties require an additional 48
6 hours to continue to negotiate the joint case management conference statement;

7 WHEREAS, as set forth in the accompany declaration of Plaintiffs' Lead Counsel
8 Elizabeth J. Cabraser, the Parties have not requested any previous extension of time;

9 IT IS THEREFORE STIPULATED AND AGREED by the Parties, subject to the Court's
10 approval, as follows:¹

11 1. The deadline for the Parties to file their joint case management conference
12 statement is August 3, 2017.

13 **SO STIPULATED.**

14 Dated: August 1, 2017

Respectfully submitted,

15 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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21 *Plaintiffs' Lead Counsel and Chair of the Plaintiffs' Steering
Committee*

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28 ¹ In entering into this stipulation, Defendants do not waive, and expressly preserve, all defenses,
including all defenses concerning jurisdiction.

1 Dated: August 1, 2017

SULLIVAN & CROMWELL LLP

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11 Dated: August 1, 2017

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17 *Counsel for Robert Bosch LLC*

18 Dated: August 1, 2017

U.S. DEPARTMENT OF JUSTICE

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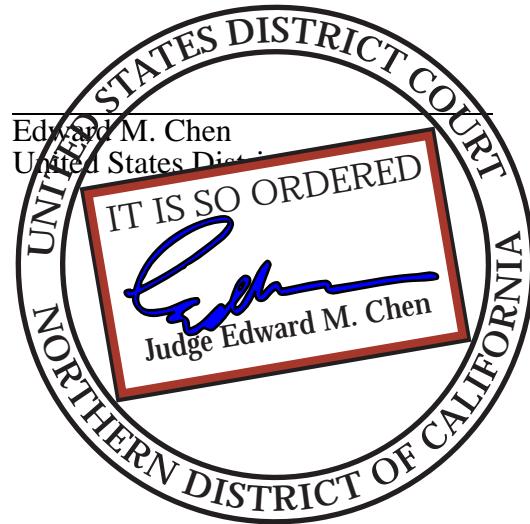
24 *Government Coordinating Counsel*

1 **[PROPOSED] ORDER GRANTING STIPULATION TO EXTEND TIME**

2 Based on the foregoing Stipulation, the Court GRANTS the Parties' Stipulation to Extend
3 Time to File Joint Case Management Conference Statement. The deadline for the Parties to file
4 their joint case management conference statement is August 3, 2017

5 IT IS SO ORDERED.

6 DATED: 8/2, 2017.



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ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from the signatories.

Dated: August 1, 2017

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 1, 2017, a true and correct copy of the foregoing was electronically filed and served electronically via the Court's CM/ECF system, which will automatically serve notice to all registered counsel of record.

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser